Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	CC Docket No. 95-116
Telephone Number Portability	)	

REPLY COMMENTS OF U S WEST COMMUNICATIONS, INC.

U S WEST Communications, Inc. ("U S WEST"), through counsel and pursuant to the Federal Communications Commission's ("Commission" or "FCC") Third Report and Order on Telephone Number Portability ("Cost Recovery Order"),[1] hereby files its reply comments to those filings made with reference to the variously filed Petitions for Reconsideration or Clarification regarding local number portability ("LNP") cost recovery.[2]

I. INTRODUCTION

Those commentors arguing that the Commission has the requisite jurisdiction to adopt the federal cost recovery methodology outlined in the Cost Recovery Order present the far more persuasive case than those arguing for a bifurcated federal/state cost recovery model. As the Commission itself noted, and as filing parties compellingly demonstrate, both the statutory structure of the Telecommunications Act of 1996 (the "Act") as well as the national nature of LNP deployment require that the entirety of a cost recovery methodology -- both cost allocation or distribution as well as cost recovery -- be resolved through the federal jurisdiction. The claims of those to the contrary are in error both legally and as a matter of policy.

U S WEST also supports those commentors who persuasively argue that the Commission misapplied the PBX/Centrex ratio in the LNP proceeding, when it departed from the structure adopted in the Access Reform Order. The current ratio formulation overly and unduly burdens multi-line PBX customers who are not responsible

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[1] In the Matter of Telephone Number Portability, CC Docket No. 95-116, RM 8535, Third Report and Order, FCC 98-82, rel. May 12, 1998 ¶ 75 ("Cost Recovery Order" or "Third Report and Order").

[2] Comments to Petitions for Reconsideration filed Sep. 3, 1998. Petitions for Reconsideration filed July 28, 1998.

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for nine times the costs of LNP deployment over and above Centrex customers.

U S WEST also supports those commentors who assert that the Commission should extend its existing LNP cost recovery methodology to incorporate those amounts expended in support of Interim Number Portability ("INP"). "Such Commission action would increase efficiency and avoid duplication of efforts in multiple state jurisdictions."[3]

Finally, as numerous commentors argue, there is no justification for the Commission having precluded carriers from recovering overhead costs with respect to LNP cost recovery. Particularly with respect to query services, the Commission must reconsider its position and allow such recovery.

II. THOSE COMMENTORS ARGUING THAT THE FCC HAS REQUISITE JURISDICTION TO PRESCRIBE THE LNP COST RECOVERY MODEL IT HAS CHOSEN ARE CORRECT

U S WEST supports those commentors stressing the propriety of the cost recovery methodology adopted by the Commission.[4] Those commentors generally oppose the position reflected in the filings of the NYDPS, the Maine PUC and PA.OCA, all of which argued that the Commission's cost recovery methodology violated both the provisions of Section 251(e)(2) and preemption jurisprudence.[5] As AT&T correctly points out, these filing parties "offer no arguments that were not previously presented to -- and properly rejected by -- the Commission."[6]

The arguments in support of an exclusive exercise of federal jurisdiction are based both on law and policy. As Bell Atlantic correctly argues, absent a recovery mechanism it would be impossible to devise a "competitively neutral" manner of cost distribution. It was precisely "this competitive disparity the Commission sought to

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[3] MCI at 13.

[4] See, e.g., Bell Atlantic at 2; BellSouth at 7-8; SBC at 3-5.

[5] The Oklahoma Rural Telephone Coalition and Texas Statewide Telephone Cooperative, Inc. ("ORTC/TSTCI") also supported state involvement in the cost recovery process in their Joint Petition for Clarification and Reconsideration (see ORTC/TSTCI at 8-9, 12). Only MCI responded to those arguments. MCI at 13.

[6] AT&T at 2 (and citing to the Eighth Circuit language regarding the explicit authorization to the Commission "'to issue regulations under subsection [ ] 251(e).'").

remedy"[7] when it determined that cost recovery was an inherent element of the Section 251 LNP mandate. As BellSouth argues, those opposing the FCC's assertion of jurisdiction over LNP cost recovery have "not offered a persuasive argument as to why the Commission's determination that an optional and temporary monthly end-user charge, as applied to an incumbent [local exchange carrier] LEC's establishment of permanent LNP pursuant to Congress's mandate, is not fully consistent with the scope of authority granted under section 251(e)(2)."[8]

Furthermore, fairness and sound public policy also compel the exclusive exercise of federal jurisdiction regarding LNP cost recovery. All signals on numbering issues from the FCC carry a "federalism" and "nationalism" ring to them. This is no less true for LNP than for other numbering issues (such as carrier identification code ("CIC") conversions and number administration). Since the passage of the Act, U S WEST has had no state initiate a long-term LNP cost recovery proceeding. Undoubtedly, the states have been awaiting federal action in this area.

U S WEST's reading of the Act is that an FCC Order regarding cost recovery for LNP should have been issued around August of 1996.[9] Had that occurred, it is possible that U S WEST might have been able to get states engaged in a material way in the issue of LNP cost recovery. Already delayed two years, however, there would simply be further unwarranted delay regarding costs -- in large part sunk by February of 1999 -- were the Commission now to adopt a federal/state cost recovery mechanism.

Particularly, given the regional nature of the LNP administrative process and the network systems involved (e.g., the signaling and operation support system components), it would be extremely difficult for U S WEST to allocate the costs in a state-specific manner. U S WEST agrees with SBC that the nationwide nature of the LNP initiative in conjunction with the architecturally efficient regional implementation structure belies a cost recovery model where there is "further delay [in] recovery of related costs for an indeterminate period of time

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[7] Bell Atlantic at 2. And see SBC at 4.

[8] BellSouth at 7-8.

[9] 47 U.S.C. § 251(d)(1).

while multiple proceedings on the same issues are adjudicated before individual state commissions with differing agendas."[10]

For these same reasons, the Commission should incorporate INP costs in those number portability costs that it allows carriers to recover through end-user surcharges.[11] During the two and a half years that INP has been the default number portability mechanism, few states have concluded INP cost recovery proceedings, buttressing U S WEST's argument regarding the expectation that cost recovery for number portability would be, most likely, a federal initiative.

Given the extensive delay associated with cost recovery for INP, the FCC should roll that cost recovery into the current LNP cost recovery methodology and close that matter.[12] While U S WEST is aware that the

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[10] SBC at 5.

[11] See MCI at 13 (supporting Ameritech's position that INP costs should be incorporated into an LNP cost-recovery regime for efficiency sake (Ameritech PFR at 12-13)).

[12] More than a year ago, U S WEST filed a Petition for Review (No. 97-9518 10th Cir.), asserting the Commission's handling of the number portability cost recovery issues was arbitrary, capricious and otherwise contrary to law. The appeal was stayed due to the Commission's repeated representations that INP cost recovery would be addressed and resolved in short order. For example, in the Commission's original "Motion to Hold in Abeyance," dated June 30, 1997, the representation was made that "the FCC staff is preparing recommendations for the Commission on the remaining issues on reconsideration. The FCC staff expects to submit recommendations to the Commission on 'interim number portability' by July 31, 1997[.]" Motion to Hold in Abeyance, filed June 26, 1997, U S WEST, Inc., v. Federal Communications Commission, No. 97-9518 (10th Cir.). In August of that same year, counsel for the Commission advised that consideration of INP "has been delayed" because "the reconsideration of 'interim' number portability required closer integration with preparation of a draft order addressing cost recovery for 'long-term' number telephone number portability raised in a separate notice" and that the staff expected to be ready to submit its recommendations to the FCC on INP by September 30, 1997 (a two month delay). Status Report from the FCC, dated Aug. 13, 1997. In October of that year, another Status Report was filed indicating that staff recommendations regarding cost recovery associated with long-term LNP had been sent to the Commission and that it was holding up its recommendation on INP until it could assess the FCC's position with respect to the LNP order. This filing noted that cost recovery for LNP and INP required "an integrated approach." Status Report of the FCC, filed Oct. 2, 1997. A filing in December of 1997 noted little progress on the INP cost recovery matter (and a delay in addressing LNP cost recovery) due to the appointments of new Commissioners. Status Report of the FCC, dated Dec. 8, 1997. Similarly, in February of 1988, a Status Report was filed indicating the need for an "integrated approach" to the LNP and INP issues and noting that a draft of the LNP cost recovery Order was pending before the full Commission for consideration and vote. Status Report of the FCC,

Commission has publicly committed to an Order addressing INP cost recovery within the next few months, we remain convinced that the only fair methodology, from a cost recovery perspective, is to incorporate such cost recovery into the cost recovery methodology outlined generally for LNP.

The incorporation of the INP amounts would assure carriers full number portability cost recovery without a significant increase in any assessed end-user surcharge.[13] Thus, the Commission should adopt such a methodology.

III. THOSE ARGUING THAT THE COMMISSION MISAPPLIED THE PBX/ CENTREX RATIO WITH RESPECT TO LNP END-USER SURCHARGES PRESENT THE BETTER ARGUMENT AND AT&T'S POSITION SHOULD BE REJECTED

Certain commentors address the Commission's treatment of the PBX/Centrex ratio associated with the LNP end-user surcharge, as that issue was raised in the variously filed Petitions. BellSouth and UTC, like U S WEST in our Petition, argue that the Commission incorrectly departed from the ratio structure it adopted in the Access Charge Reform Order and inappropriately adopted a surcharge structure that unduly burdens multi-line customers in such a manner that both service and carrier choices will be inappropriately skewed.[14] Alone among all those filing for reconsideration or commenting on this matter stands AT&T who argues the Commission got it right.

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dated Feb. 12, 1998. In April of this year, it was represented that active engagement regarding the contents of the Draft Order was ongoing and that the Stay should remain in effect. Status Report of the FCC, dated Apr. 23, 1998.

In August of this year, the filed Status Report indicated that the staff "has been working on a recommended decision for a Reconsideration Order concerning interim number portability cost recovery issues, as part of the Commission's integrated approach to the matter [of number portability cost recovery and] anticipates that it will send its recommended decision for a Reconsideration Order . . . to the Chairman's Office by October 15, 1998." Status Report of the FCC, dated Aug. 3, 1998.

[13] For example, in U S WEST's case, incorporating INP costs into the LNP cost-recovery methodology would add less than five cents to the end-user surcharge.

AT&T is incorrect in its analysis. The kind of rationale that AT&T seeks to insinuate into the Commission's resolution of the PBX/Centrex issue is simply not evident from the Commission's Cost Recovery Order.[15] For example, AT&T argues that the Commission's Cost Recovery Order "links LNP surcharges to a customer's use of LNP functionality provided by the LEC,"[16] and that it is this "linkage" that supports the Commission's determination that LECs may assess a monthly surcharge on resellers and purchasers of unbundled network elements ("UNE"). While the linkage AT&T references is evident with respect to the Commission's treatment of assessment of end-user surcharges and resellers and UNE purchasers, it is not a demonstrated linkage with respect to the PBX/Centrex issue. But the linkage AT&T observes does not necessarily support the Commission's departure from its prior handling of the PBX/Centrex cost recovery allocation analysis in the Access Charge Reform Order.[17]

Handling the surcharge structure along the lines of those advocating for consistency between the Access Charge Reform Order and the current Cost Recovery Order would not adversely affect carriers acting as resellers or purchasing UNEs. In those circumstances where the reseller is providing 1FR or 1FB services, the carrier will be assessed a single end-user surcharge. Where the resale or UNE purchase involves PBX services, the carrier/reseller will pay one end-user surcharge rather than nine times that charge. This is the appropriate linkage to a cost recovery allocation system where it is undisputed that "LEC LNP costs do not increase nine-fold for a

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[14] See, e.g., BellSouth PFR at 1-5 (the Commission's treatment "will artificially discourage a multi-line business customer's selection of both service and service provider"); UTC Comments at 1, 3-5. And see Petition for Reconsideration of U S WEST, Inc., CC Docket No. 95-116, filed July 29, 1998 at 3-7 ("U S WEST PFR").

[15] In the Matter of Telephone Number Portability, CC Docket No. 95-116, RM 8535, Third Report and Order, FCC 98-82, rel. May 12, 1998 ("Cost Recovery Order").

[16] AT&T at 10.

[17] In the Matter of Access Charge Reform, Price Cap Performance Review for Local Exchange Carriers, Transport Rate Structure and Pricing, Second Order on Reconsideration and Memorandum Opinion and Order, 12 FCC Rcd. 16606 (1997) ("Access Charge Reform Order").

PBX subscriber relative to a Centrex subscriber."[18] In such circumstance, PBX customers should not be forced to make disproportionate contributions to the cost recovery associated with LNP.[19]

Furthermore, it is no small matter that changing the allocation/billing ratio will materially affect LEC billing systems. As BellSouth notes, requiring changes in these billing systems to accommodate a different ratio structure will involve thousands of hours of design and programming changes.[20] For all the reasons provided by those commentors addressing this issue in the variously-filed Petitions for Reconsideration and Clarification, as well as the filed comments on them, the Commission should revert to the PBX/Centrex allocation methodology it adopted in the Access Charge Reform Order.

IV. OVERHEAD LOADINGS SHOULD BE PERMITTED WITH RESPECT TO THE LNP COST RECOVERY, PARTICULARLY WITH REGARD TO QUERY SERVICES

Certain commentors argue the propriety of allowing the recovery of overhead loadings in an LNP cost recovery context.[21] While U S WEST agrees with these commentors, as a general matter, we believe the matter of the propriety of overhead loadings is most particularly obvious with respect to query services, as we argued in our own Petition.[22] Our position with respect to query services is supported by BellSouth and CBT. BellSouth argues -- correctly -- that the preclusion of recovery of overhead costs with respect to query services is inconsistent with the language of Section 251(e)(2), Commission precedent[23] and sound policy.[24] Particularly given the competitive nature of the query services offering, "[c]arriers should be free to capture the overhead costs attributable to those

[18] BellSouth at 2.

[19] UTC at 4.

[20] BellSouth at 3.

[21] See, e.g., BellSouth at 4-6; SBC at 2-3.

[22] U S WEST PFR at 7-9. See also Bell Atlantic PFR at 4. Accord Ameritech PFR at 7-8.

[23] And see CBT at 2-3 (discussing prior Commission precedent, including most recently the Commission's Interconnection Order, CC Docket No. 96-98, FCC 96-325, rel. Aug. 8, 1996 at ¶ 69).

[24] BellSouth at 6.

services in any reasonable manner."[25]

Vanguard, TRA and AT&T all argue against the recovery of overhead loadings. And, quite often, the arguments are against the utilization of overhead loadings altogether, in any context, not just with respect to query services.

While Vanguard argues that certain "limits" must be placed on LNP cost recovery, it makes no compelling case why overhead costs -- which Vanguard candidly admits are "costs of doing business"[26] should not be permitted to be recovered through the charges established for query services. Rather, it merely concludes that the inclusion of such costs "would make the Commission's cost recovery process even more susceptible to manipulation and anticompetitive conduct than it already is," citing to query tariffs.[27]

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[25] Id.

[26] Vanguard at 3.

[27] Id. and n.6. There appears to be some significant confusion over the use of the term "overhead loadings" in the LNP cost recovery contexts. Vanguard references "general overhead factors" arguing that such are "unrelated costs in the calculation of carrier-specific costs for LNP." Vanguard at 2-3. TRA refers to "general overhead costs other than those incremental additional overhead costs that [can be demonstrated to be] incurred specifically in providing long-term number portability." TRA at 2. The inclusion of such costs in a query charge, TRA argues, would "inflate[ ] by excess overhead expense" the query charge in a manner that "would compromise the competitive neutrality of the recovery scheme." Id. at 3. AT&T references such loadings as "'general overhead' factors" providing as descriptions "items such as a proverbial 'piece of the CEO's desk,' or a corporate jet." AT&T at 4-5.

While there seems to be no common use of the term, AT&T claims that the current query charge tariff proposals include "shockingly bloated" "overheads," claiming that U S WEST's tariff "proposes an overhead loading factor of 2.41 – i.e., two hundred and forty-one percent." AT&T at 5. AT&T argues that such overhead charges are "absurd" and "openly defy the [Commission's] mandate that ILECs may recover only 'carrier-specific costs directly related to providing number portability,' and lay bare the ILEC's insupportable claims that they seek to employ general overhead factors only as a means to recover their actual costs." Id.

Given AT&T's long-time participation in the regulatory process, including the tariff process, U S WEST is perplexed by AT&T's representations, particularly its attack on U S WEST's loading factor. That loading factor represents actual book costs, not "bloated overheads." Since the FCC implemented price caps, U S WEST – as well as others in the industry – have presented two cost figures for new services. The first is a forward-looking cost to set a price floor. The other is the equivalent of fully distributed cost ("FDC") which is calculated using embedded costs and establishes a ceiling for pricing purposes. This price ceiling or FDC is determined by applying a loading factor, which is based on Part 69 expense ratios, to forwarding-looking cost. Although this loading

TRA makes a similar argument, stating that allowing for the inclusion of overhead loadings with respect to the "unique circumstance[s]" associated with the LNP offerings would violate the competitive neutrality requirements of the statute and would somehow (never demonstrated) result in a double recovery.[28] This would be true, according to TRA, both with respect to end-user surcharges as well as query charges.[29] AT&T also argues that the competitive neutrality provisions of the statute would be compromised by allowing the inclusion of overhead loadings into a carrier's rates.[30]

None of these commentors presents any persuasive or compelling evidence why overhead loadings of at least some type should not be permitted with respect to the prices charged for query services. Their arguments are basically nothing more than references to the statutory language, which -- of course -- nowhere references overhead loadings.

None of them address the "nature" of query services (and their concomitant costs). It is clear that the nature of the query offering is more consistent with traditional carrier offerings with carrier overhead loadings than with the end-user surcharge -- a charge seeking to recover extraordinary carrier costs associated with a

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factor normally includes general corporate overheads, U S WEST did not intend to include these overheads in the case of the LNP query charge. It is to be able to include such overheads that U S WEST Petitioned for Reconsideration on the overheads issue.

Unfortunately, U S WEST has recently determined that we inadvertently failed to exclude general corporate overheads from our query charge tariff. We will be amending our query service tariff in the near future to remove these corporate overheads, pending the outcome of the reconsideration proceeding. However, correcting for this oversight does not produce anywhere near the level of costs that AT&T asserts. Exclusion of these costs would decrease total costs 10% to 15%, at most. Finally, to the extent AT&T -- or others -- have specific arguments against the pricing of query services, such arguments are better raised in the appropriate tariff proceeding than here. Compare Cost Recovery Order ¶ 147 ("Carriers shall indicate in the cost support section of their tariffs the portion of their carrier-specific costs directly related to providing number portability attributable to the . . . number portability query services they provide on behalf of other carriers.").

[28] TRA at 3-7.

[29] Id. at 6.

[30] AT&T at 7 (where AT&T asserts that such would be the case but offers no explanation as to how or why).

massive federal regulatory and statutory initiative.

The arguments of Vanguard, TRA and AT&T are entirely speculative and run counter to the statutory language, long-standing Commission precedent and sound economic and public policy. The arguments should be rejected, and the Commission should allow the recovery of such costs with respect to query charges.

V. CONCLUSION

U S WEST urges the Commission to remain resolute with respect to its assertion of jurisdiction over the cost recovery for LNP. It's analysis in this area is sound, both as a matter of law and policy. Furthermore, U S WEST supports those arguing for a reconsideration of the PBX/Centrex ratio for assessment of LNP end-user surcharges as well as the inclusion of overhead loadings in the costing/pricing of query services.[31]

Respectfully submitted,

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[31] AT&T replies to an argument made by Sprint Local regarding carrying charges associated with accelerated switch replacements. AT&T at 8-9. Sprint argued that such charges are direct costs of LNP. See Sprint Local Petition for Reconsideration and Clarification at 4-5. Because we agree with AT&T that this type of "argument is under consideration in the Commission's proceeding on 'joint and common' LNP costs" (AT&T at 8), U S WEST does not respond to the argument here. See U S WEST Comments, filed herein Aug. 3, 1998 and U S WEST's Reply Comments filed concurrently herein Sep. 16, 1998.

CERTIFICATE OF SERVICE

I, Rebecca Ward, do hereby certify that on this 16th day of September, 1998, I have caused a copy of the foregoing REPLY COMMENTS OF U S WEST COMMUNICATIONS, INC. to be served, via first class United States Mail,* postage pre-paid, upon the persons listed on the attached service list.

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